

[Counsel Listed on Signature Block]

MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. ATMEL CORPORATION, Defendant.	Case No. 5:15-cv-02212-PSG
MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. FREESCALE SEMICONDUCTOR, INC., Defendant.	Case No. 5:15-cv-02213-PSG
MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. MICROCHIP TECHNOLOGY, INC.	Case No. 5:15-cv-02546-PSG

**JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO
SCHEDULE INITIAL CASE MANAGEMENT CONFERENCE FOR AUGUST 11, 2015**

Pursuant to Civil L.R. 3-12, the parties in Case Nos. 5:15-cv-02212-PSG, 5:15-cv-02213-PSG, and 5:15-cv-02546-PSG (“Proposed Related Actions”) submit this joint administrative motion to consider these cases related to each other. The parties further propose, pursuant to Civil Local Rule 6-2(a), that the Case Management Conferences in all three Proposed Related Actions be scheduled for August 11, 2015.

PROCEDURAL HISTORY

All three Proposed Related Actions were recently transferred by stipulation to the United States District Court for the Northern District of California from the United States District Court for the District of Delaware, and have all been assigned to Magistrate Judge Paul Singh Grewal. The

1 Plaintiff in all three Proposed Related Actions is MCU Clocking Solutions, Inc. ("MCU"), and all
2 three actions involve U.S. Patent No. 6,292,045. Two of the three Proposed Related Actions, Case
3 Nos. 5:15-cv-02213-PSG and 5:15-cv-02546-PSG, also involve U.S. Patent No. 7,296,170. The Case
4 Management Conferences in Case Nos. 5:15-cv-02212 and 5:15-cv-02213 are currently both
5 scheduled for June 30, 2015, whereas the Case Management Conference in Case No. 5:15-cv-02546
6 has not yet been scheduled.

8 **BRIEF STATEMENT OF RELATIONSHIP BETWEEN CASES**

9 The Proposed Related Actions meet the criteria for related cases under Civil L.R. 3-12. MCU
10 alleges that the named Defendants in each of the actions infringe one or both asserted patents by
11 making, using, offering for sale, selling, and/or importing microcontrollers that embody every
12 element of at least one Claim of either or both of the asserted patents. Discovery, motion practice,
13 and hearings, therefore, are likely to concern many of the same issues. Furthermore, the parties
14 believe that proceeding with uncoordinated cases before separate judges would cause an unduly
15 burdensome duplication of labor and expense. While the parties recognize that there may be separate
16 trials in each of the three separate cases, respectively, they believe coordination of pre-trial matters
17 will be beneficial.

18 Additionally, the parties believe that a single Case Management Conference for all three
19 Proposed Related Actions would avoid a needless duplication of effort and expense by the parties,
20 and would also serve the interests of judicial economy by allowing the Court to conduct a single Case
21 Management Conference rather than multiple conferences.

22 **CONCLUSION**

23 For the reasons stated above, the parties respectfully request that the Proposed Related
24 Actions all be deemed to be related to each other. The parties further propose that, pursuant to Civil
25

Local Rule 6-2(a), a single Case Management Conference for all three Proposed Related Actions be scheduled for August 11, 2015, with the parties filing a Joint Case Management Statement by August 4, 2015.

Dated: June 17, 2015

Respectfully Submitted,

By: /s/ Vasilios E. Sanios

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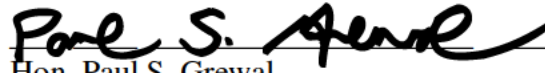
ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the Signatories listed above.

/s/ Vasilios E. Sanios
Vasilios E. Sanios

PURSUANT TO THE JOINT MOTION OF THE PARTIES, IT IS SO ORDERED.

Date: June 18, 2015


Hon. Paul S. Grewal
United States District Court Magistrate Judge

PROOF OF SERVICE

I, Vasilios E. Sanios, Esquire, hereby certify that on the 17th day of June, 2015, I served the above JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO SCHEDULE THE INITIAL CASE MANAGEMENT CONFERENCE FOR AUGUST 11, 2015, via email, to the following addresses:

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